

6. Denied.

7. Denied.

8. Denied.

9. Denied.

10. Movant had no need to incur legal fees as there is no post petition default.

11. Admitted.

WHEREFORE, debtor prays for an order denying the relief requested and awarding attorney fees to the Debtor for the cost of responding to the instant motion which motion was brought in bad faith.

RESPECTFULLY SUBMITTED,

/s/ RICHARD N. LIPOW

By _____
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document with any and all exhibits and Notice of Motion were electronically served on the movant's attorney, as well as the US and Chapter 13 Trustees at the time those documents were filed.

Dated: 9/13/16

/s/ Richard N Lipow
Richard N Lipow
Attorney for the Debtor